REMARKS

Claims 120-127 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. The claims have been amended with language that more clearly finds support in the underlying specifications of the pending application and its parent priority applications. Applicants submit that the claims now clearly satisfy Section 112 and should be allowed.

The claims are fully supported by the specification and indeed by the specifications of each of the parent applications 6,072,780 ('780), 6,266,328, 6,480,474, 6,661,779 back to the originally filed provisional application. The latter two patents are continuations of the '328 patent, as is the present application, therefore support in these three patents is reflected by reference to the present application ("App."). Claims 120 and 125 have been amended to refer to "status information" so as to better conform to the language of the patent specifications. For example, the provisional application recites, "to receive status information from the telephone switch 34, via the Internet 30." (page 4) (also found in '780 at col. 2, l. 60-61; App. at p. 3, l. 9-10) The application more specifically refers to "telephone connection status information as established by the switch 34." (page 5) (also found in '780 at col. 3, l. 14-15; App. at p. 3, l. 23-24)

"Two or more conferees" is found in the provisional application on the second page where the application recites explicitly, "a conference of multiple conferees" on line 10 and line 19, "the telephone connections between the multiple conferees." (see '780 at col. 1, l. 48-49, 60-61; App. at p.2, l. 11, p. 22, l. 2) Webster's Ninth New Collegiate Dictionary, 1986 and the Merriam-Webster's Collegiate Dictionary, Eleventh Edition, 2003 both define "multiple" as "consisting of, including, or involving more than one." Hence, two or more is supported by the term "multiple."

The telephone network operates in a "conventional manner" as set forth on page 4 of the provisional application. (also found in '780 at col. 2, l. 44-46; App. at p. 2, l. 27 – p. 3, l. 1) As such, conventional SS7 is used. It is "Signalling System 7 (SS7) commands which act on the switch 34, and attendantly, on the telephone network 32 to control the conferee telephones." (provisional page 4, '780 at col. 3, l. 3-6; App. at p. 3, l. 16-18)

The "receiving at a switch interface ..." element has been amended to more closely conform to the language of the patent specifications. As amended, the claims 120

fully finds support in the specifications. The provisional application at page 4 specifies "A switch interface 33 controlling a telephone switch 34 is also connected so as to receive control signals via the Internet 30…" (emphasis added). (also found in '780 at col. 2, l. 47-49; App. at p. 3, l. 2-3) At page 3 of the provisional application, it states, "Via the Internet, the conference Meister sends digital control signals to a switch interface controlling a telephone switch as a gateway to the telephone network. These control signals include the numbers of the preselected conferee telephones … and the order in which the conferees are to be rung up and brought on line." (emphasis added). (also found in '780 at col. 2, l. 5-11)("The in-charge conferee sends digital control signals to a switch interface controlling a telephone switch as a gateway to the telephone network using SS7 control signals. These SS7 control signals include the commands by which the conferee telephones are rung up, brought on line, or dropped from the conference." App. at p. 22, l. 7-10) For example, in Table I, the EC command is defined as, "ESTABLISH CONNECTION. A Conference Meister's request that a specified telephone number be connected to a conference." (provisional, p. 6; '780 at col. 3, l. 51-54; App. at p. 4)

The "sending from the switch interface via an IP network a message indicating the selected telephone has been successfully brought on line for the conference" element finds full support in the specifications. The provisional application states at page 5, "It will be noted that the switch interface 33 is bi-directional, and telephone connection status information…i.e., ringing, off-hook…is transmitted back via the Internet to the Conference Meister…" (also found in '780 at col. 3, l. 13-18; App. at p. 3, l. 22-25) As is well known, a telephone rings when it is on hook and is brought on line when it is lifted off-hook. For example, in Table I, the SU response is defined as, "SUCCESS. The Switch Interface's response to an EC (Establish Connection) request. If successfully completed. It returns a connection-id used to refer to this members conference connection." (provisional, p. 6; '780 at col. 3, l. 54-59; App. at p. 4)

The final elements of "receiving at the switch interface" and "sending" have been amended to refer to "disconnect" as it is the message explicitly named in the Table I. The final "sending" element has been rearranged to make it clear that the disconnect message is produced in response to the SS7 message. These elements as amended find complete support in the specifications. Note that the "telephones 20, 24, 28, 17 are tied into the telephone network 32 in a conventional manner." (provisional at

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page 4; '780 at col. 2, l. 44-46; App. at p. 2, l. 27 – p. 3, l.1) When a telephone is placed on hook to disconnect a call, the conventional SS7 message is sent to the switch. "The switch interface 33 interacting with the switch 34…performing the table lookup translation of SS7 commands into CPDU commands…" (provisional at page 5; '780 at col. 3, l. 9-13; App. at p. 3, l. 20-22) "It will be noted that the switch interface 33 is bi-directional, and telephone connection status information as established by the switch 34, i.e., ringing, off-hook, on-hook[,] busy…is transmitted back via the Internet to the Conference Meister…" (provisional at p. 5; '780 at col. 3, l. 13-18; App. at p. 3, l. 22-25) For example, in Table I, the DC response is defined as, "DISCONNECT. An unsolicited response from the Switch Interface notifying the Conference Meister that a conference members connection has been disconnected." (provisional, p. 6; '780 at col. 4, l. 7-10; App. at p. 4) Thus, all of the elements of claim 120 are fully supported and described by the present specification and each priority application back to the provisional. The requirements of 35 U.S.C. 112 have been met and the claim is in condition for allowance.

Claim 121 calls for the "message containing at least one number is received by the switch interface via the IP network." As more fully explained above with regard to "receiving at a switch interface…," the patent specifications specify "A switch interface 33 controlling a telephone switch 34 is also connected so as to receive control signals <u>via the Internet</u> 30…" (emphasis added). Thus, claim 121 is supported by the specifications, satisfies 35 U.S.C. 112 and should be allowed.

Claim 122 recites "converting the message containing at least one telephone number to an SS7 message for ringing up the selected telephone for the conference." The claim has been amended to conform the language to that of claim 120. The provisional application explains "A switch interface 33 controlling a telephone switch 34 is also connected so as to receive control signals via the Internet 30 and to transmit them to the telephone network 32, as will be described below." (page 4) (also found in '780 at col. 2, l. 48-52; App. at p. 3, l. 2-4) The application goes on, "The switch interface 33 converts the CDPU into Signalling System 7 (SS7) commands which act on the switch 34, and attendantly, on the telephone network 32 to control the conferee telephones 20, 24, 28, 17." (provisional at page 4; '780 at col. 3, l. 3-6; App. at p. 3, l. 16-18) The EC command seeks to establish a connection to a specified telephone number. (See Table I in

all specifications) Thus, claim 122 is supported by the specifications, satisfies section 112 and should be allowed.

Claim 123 recites "receiving at the switch interface an SS7 message that characterizes ringing." The conventional SS7 ringing message is called out specifically in the specifications. "It will be noted that the switch interface 33 is bi-directional, and telephone connection status information as established by the switch 34, i.e., ringing, off-hook…is transmitted back via the Internet to the Conference Meister…" (provisional at p. 5; '780 at col. 3, l. 13-18; App. at p. 3, l. 22-25) (emphasis added) Telephone switch 34 is on the telephone network, which operates in a conventional manner using SS7 messages. Claim 123 is thus supported by the specifications, satisfies section 112 and should be allowed.

Claim 124 recites "receiving at the switch interface, prior to sending the message indicating the selected telephone has been successfully brought on line for the conference, an SS7 message that characterizes an off-hook condition." The claim has been re-arranged for clarity and conformity with the other claims. The off-hook message is called out specifically on page 5 of the provisional application. "It will be noted that the switch interface 33 is bi-directional, and telephone connection status information as established by the switch 34, i.e., ringing, off-hook…is transmitted back via the Internet to the Conference Meister…" (provisional at p. 5; '780 at col. 3, l. 13-18; App. at p. 3, l. 22-25) (emphasis added) Telephone switch 34 is on the telephone network, which operates in a conventional manner using SS7 messages. In Table I of all the specifications, the SUCCESS response is only sent from the switch interface if the connection was successfully completed. Thus, the phone goes off-hook, the conventional off-hook SS7 message is received and then the SUCCESS response is sent. Thus, the specifications fully require the off-hook message before signaling success. Claim 124 is supported by the specifications, satisfies section 112 and should be allowed.

Claim 125 contains numerous elements also found above in claim 120. The support for such elements can be found above and thus need not be repeated here. Claim 125 further calls for "receiving an SS7 message that characterizes ringing." The support for this element is explained above with respect to claim 123. Claim 125 further calls for "receiving an SS7 message that characterizes an off-hook condition." The support for this element is explained above with respect to claim 124. The remaining elements are

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found in claim 120. For the reasons explained above with respect to claims 120, 123 and 124, the elements of claim 125 are fully supported by the specifications. Thus, claim 125 satisfies 35 U.S.C. 112 and should be allowed.

Claim 126 is supported by the specifications as explained above with respect to claim 121. Thus, claim 126 should be allowed.

Claim 127 is supported by the specifications as explained above with respect to claim 122. Thus, claim 127 should be allowed.

Claim 128 has been added to more particularly give the interaction between the SS7 off-hook message and the IP success message. The provisional application states at page 5, "It will be noted that the switch interface 33 is bi-directional and telephone connection status information as established by the switch 34, i.e., ringing, off-hook…is transmitted back via the Internet to the Conference Meister…" (also found in '780 at col. 3, l. 13-18; App. at p. 3, l. 22-25) "The switch interface 33 interacting with the switch 34…performing the table lookup translation of SS7 commands into CPDU commands…" (provisional at page 5; '780 at col. 3, l. 9-13; App. at p. 3, l. 20-22) As is well known, a telephone rings when it is on hook and is brought on line when it is lifted off-hook. For example, in Table I, the SU response is defined as, "SUCCESS. The Switch Interface's response to an EC (Establish Connection) request. If successfully completed. It returns a connection-id used to refer to this members conference connection." (provisional, p. 6; '780 at col. 3, l. 54-59; App. at p. 4) Thus, claim 128 is supported and should be allowed.

The present application is a continuation application. Submitted herewith are terminal disclaimers with respect to all of the parent patents. In view of the terminal disclaimers, obviousness-type double patenting is eliminated as a potential issue.

For all of the foregoing reasons, applicants submit that all claims are in compliance with 35 U.S.C. 112. Having overcome the rejections, the claims are in

condition for allowance and early notice to that effect is respectfully solicited.

Respectfully submitted,

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